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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

11 MICHELLE FERRELL,

12 Plaintiff,

13 v.

14 GNLV, LLC d/b/a GOLDEN NUGGET LAS
15 VEGAS HOTEL AND CASINO; DOES I-X,
16 inclusive, and ROE CORPORATIONS I-X,
17 inclusive,

17 Defendants.

Case No. 2:24-cv-01527-APG-NJK

**STIPULATION AND ~~PROPOSED~~ ORDER
TO EXTEND DISCOVERY DEADLINES**

(FIRST REQUEST)

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19 IT IS HEREBY STIPULATED AND AGREED, between the parties and their attorneys of
20 record, that **the current discovery deadlines to be extended as indicated on page 3**, pursuant to
21 Local Rule 26-1(b) and 26-3.

22 **I.**
23 **DISCOVERY COMPLETED TO DATE**

- 24 1. The parties have conducted the FRCP 26.1 Early Case Conference.
25 2. Defendant produced its Lists of Witnesses and Documents, pursuant to FRCP 26(a)
26 on August 16, 2024, disclosing approximately 34 pages.
27 3. Plaintiff produced her Lists of Witnesses and Documents pursuant to FRCP 26(a)
28 on September 12, 2024, disclosing approximately 300 pages.

5. Deposition(s) of Plaintiff's treating physicians.
6. Deposition of other percipient witnesses.
7. Depositions of experts.
8. Issuing subpoenas to additional third-parties, including Plaintiff's medical providers (if any).
9. Additional written discovery (if necessary).
10. Any remaining discovery the parties deem relevant and necessary as discovery continues.

III.

REASONS THE PARTIES REQUEST TO EXTEND THE DISCOVERY DEADLINES

The parties respectfully submit, pursuant to Local Rule 26-3, that good cause exists for the following requested extension. This Request for an extension of time is not sought for any improper purpose other purpose of delay. Good cause exists for the following reasons: the parties have been diligently working on scheduling a Rule 35 independent medical examination of Plaintiff. The Examination is scheduled for December 16, 2024 with Dr. Sutherland; however due to the holidays his expert report will be available at least 30 days after the Examination. In addition, with the holiday season, other experts are running into issues with the current deadline. The parties therefore request a modest extension of the remaining case deadlines as outlined below to allow sufficient time for plaintiff's examination, and the preparation of the expert reports.

Extension or Modification of The Discovery Plan and Scheduling Order.

Discovery Deadline	Current Deadline	Proposed Deadline
Motion to Amend/Add Parties	November 29, 2024	November 29, 2024
Initial Expert Disclosures	December 27, 2024	January 27, 2025
All Rebuttal Expert Disclosures	January 27, 2025	February 26, 2025
Discovery Cut-Off Date	February 27, 2025	March 28, 2025
Dispositive Motions	March 31, 2025	April 30, 2025
Pretrial Order	April 30, 2025	May 30, 2025

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1 The parties represent this Stipulation is sought in good faith and not interposed for delay or
2 any other improper purpose.

3 DATED this 6th day of December, 2024.

DATED this 6th day of December, 2024.

4 **THE COTTLE FIRM**

TYSON & MENDES LLP

5 /s/ Matthew G. Holland
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11 **IT IS SO ORDERED.**

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UNITED STATES MAGISTRATE JUDGE

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15 DATED December 6, 2024